

1 John L. Beers (State Bar No. 70117)
Christina M. Kotowski (State Bar No. 197266)
2 FISHER & PHILLIPS LLP
3 One Embarcadero Center, Suite 2340
San Francisco, CA 94111-3712
4 Phone: (415) 490-9000
Fax: (415) 490-9001
5 Email: jbeers@laborlawyers.com
ckotowski@laborlawyers.com

6
7 Rosemary S. Gousman (Admitted Pro Hac Vice)
FISHER & PHILLIPS LLP
8 580 Howard Avenue
Somerset, NJ 08873
9 Phone: (732) 560-7100
Fax: (732) 560-0788
10 Email: rgousman@laborlawyers.com

11 Attorneys for Plaintiff and Counterdefendant
12 BERLEX, INC.

13 Andrew M. Wolfe (State Bar No. 114076)
14 ROPERS, MAJESKI, KOHN & BENTLEY
201 Spear Street, Suite 1000
15 San Francisco, CA 94105
Phone: (415) 543-4800
16 Fax: (415) 972-6301
Email: awolfe@ropers.com

17 Attorneys for Defendant and Counterclaimant
18 FRANCO PASQUALE

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20 IN THE UNITED STATES DISTRICT COURT
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA

22 BERLEX, INC., a Delaware corporation,
23
24 Plaintiff and Counterdefendant,
25 v.
26 FRANCO PASQUALE, an individual,
27 Defendant and Counterclaimant.
28

Civil Action No. C06-07043 JSW

**STIPULATED REQUEST FOR
CONTINUANCE OF CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER**

1 The undersigned counsel for the parties in this action jointly request a continuance of
 2 the case management conference in this action from the present date of April 6, 2007 until May
 3 4, 2007, or such subsequent date as is convenient for the Court. The parties also request a
 4 continuance of the associated ADR deadlines.

5 The parties request a continuance of the scheduled case management conference for the
 6 following reasons: Although the complaint was filed on November 13, 2006, Plaintiff Berlex,
 7 Inc. was not able to personally serve Defendant Franco Pasquale until January 26, 2007.
 8 Plaintiff stipulated to extend the time in which Defendant could answer or otherwise respond to
 9 the complaint, and Defendant thereafter filed an Answer and Counter-Claims on March 1,
 10 2007. Plaintiff has until March 25, 2007 to respond to Defendant's counterclaims, and requires
 11 additional time to investigate the allegations made in the counterclaims before it will be able to
 12 meaningfully participate in the Rule 26(f) conference, make its initial disclosures, or prepare its
 13 portion of the joint case management conference statement for the Court. A continuance of
 14 approximately one month should be sufficient to allow Berlex, Inc. to respond to Pasquale's
 15 counterclaims and fulfill its obligations in advance of the case management conference.

16 Dated: March 16, 2007

FISHER & PHILLIPS LLP

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 18 By: Christina M. Kotowski
 19 Christina M. Kotowski
 20 Attorneys for BERLEX, INC.

21 Dated: March 16, 2007

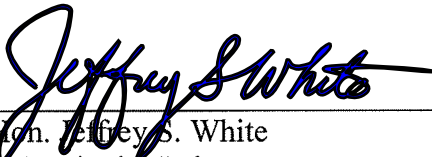
ROPERS, MAJESKI, KOHN & BENTLEY

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 23 By: Andrew M. Wolfe
 24 Andrew M. Wolfe
 25 Attorneys for FRANCO PASQUALE
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1 The Court has received the parties' stipulated request for a continuance of the case
2 management conference and the associated deadlines. Good cause appearing, the Court hereby
3 CONTINUES the case management conference scheduled at 1:30 p.m. on April 6, 2007 in
4 Courtroom 2 until 1:30 p.m. on May 11, 2007, 2007 in Courtroom 2. The ADR
5 deadlines associated with the initial case management conference are also continued, and shall
6 be calculated from the date of the new case management conference.

7 IT IS SO ORDERED.

8 Dated: March 19, 2007


Hon. Jeffrey S. White
U.S. District Judge